

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:
NYDIA M. TORRES BONACIA
Debtor

CASE NO. 11-07193 BKT
CHAPTER 13

**STATEMENT OF PURPOSE FOR
AMENDED PAYMENT PLAN DATED 10/21/2011**

TO THE HONORABLE COURT:

COMES NOW DEBTOR through its undersigned counsel of record and before this Court most respectfully states and prays:

1. Pursuant to Local Bankruptcy Rule 1009-1 debtor hereby provides a Statement of Purpose as to Amended Payment Plan dated October 21, 2011, which has been amended as follows;

2. The payment plan has been amended to clarify treatment of unsecured claims which will be paid by Trustee.

WHEREFORE, debtor most respectfully requests that this Court take note of aforementioned amendment.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico on October 24, 2011.

DEBTOR AND UNDERSIGNED ATTORNEY HEREBY CERTIFY: that this motion has been filed using the Bankruptcy Court's ECF/ECM electronic filing system who will automatically notify all participants to said system including the Chapter 13 Trustee; All other parties included in attached master address list who are not participants of the Court's automatic filing system are being notified via regular mail.

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:

NYDIA M. TORRES BONACIA

BK CASE # 11-07193 MCF

CHAPTER 13

DEBTOR(S)

CHAPTER 13 PAYMENT PLAN 10/21/11

- 1 - The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 10/21/11

☒ PRE ☐ POST-CONFIRMATION

☐ AMENDED PLAN DATED: _____
FILED BY ☐ DEBTOR ☐ TRUSTEE ☐ OTHER

1. PAYMENT PLAN SCHEDULE

\$ 650.00 x 60 = \$39,000.00
\$ x =
\$ x =
\$ x =
\$ x =
TOTAL = \$39,000.00

Additional Payments:

\$ to be paid as a LUMP SUM
within with proceeds to come from

☐ Sale of property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
addition to the above.

\$ x =

PROPOSED BASE: \$39,000.00

III. ATTORNEY'S FEES

(To be paid as administrative expenses)

Outstanding balance as per Rule 2016(b) Fee

Disclosure Statement: \$ 3,000.00

See Addendum for payment of attorney's fees

Signed: /s/ Nydia M. Torres Bonacia
DEBTOR

JOINT DEBTOR

/S/ Noemi Landrau Rivera
Attorney for debtor

11 DISBURSE FUNDS IN THE FOLLOWING ORDER AFTER ADMINISTRATIVE EXPENSES

A- ADEQUATE PROTECTION PAYMENTS CR \$

B. SECURED CLAIMS.

☒ Debtor represents no secured claims.

☐ Creditors having secured claims will retain their liens and shall be paid
as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. Cr. Cr.

\$ \$ \$

2. ☐ Trustee pays IN FULL Secured Claims

Cr. Cr. Cr.
#

3. ☐ Trustee pays VALUE OF COLLATERAL

Cr. Cr. Cr.

\$ \$ \$

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ OTHER:

6. ☐ Debtor Otherwise maintains regular payments directly to:

C. PRIORITIES. The Trustee shall pay priorities in accordance with the law.
(11 U.S.C. § 507 and § 1322 (a)(2))

D. UNSECURED CLAIMS. Plan ☐ Classifies ☐ Does not Classify Claims.

1. (a) Class A- ☐ Co-debtor Claims / ☐ Other:

☐ Paid 100% / ☐ Other:

Cr. Cr. Cr.
#

(b) ☐ Other:

2. Unsecured Claims otherwise receive PRO-RATA disbursements

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecured, etc.)

SEE ADDENDUM TO PLAN

ATTORNEY FOR DEBTOR: /s/NOEMI LANDRAU RIVERA, ESQ

Phone 787-774-0224

UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO

IN RE:
NYDIA M. TORRES BONACIA
DEBTOR

CASE NO.11-07193 MCF

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ADDENDUM TO AMENDED PAYMENT PLAN DATED 10/21/2011

Debtor hereby notifies all parties in interest in the instant case as per attached master address list, that funds to be paid to the Trustee shall be disbursed to creditors in the following manner upon confirmation of the plan. The following provisions are part of Debtors' amended plan dated October 21, 2011:

1. Attorney's fees shall be rendered at a rate of \$175.00 per hour. Fees in excess of \$3,000.00 shall be paid by Trustee upon application for compensation to be filed by counsel for debtor and approval by the Bankruptcy Court. Attorney's fees shall be paid ahead of all other creditors in the instant case.

2. Upon entry of discharge, all amounts owed to unsecured creditors Francisca Camacho Velázquez, Carmen Ines Camacho Velázquez, Rubis Marilia Camacho Velázquez, Francisco Camacho Velázquez and Evelyn Camacho González shall be deemed paid in full. Bankruptcy Court shall retain jurisdiction over real property to order the Registrar of Property to inscribe the entire real property located at Urb. Santa Elena Calle B N-18, Bayamón, Puerto Rico listed in Schedule A in favor of Debtor. Upon completion of payment plan and entry of discharge by the Bankruptcy Court, all amounts owed to named creditors are subject to the discharge injunction and are deemed paid in full.

3. Notice to all creditors as per attached master address list.

/s/ Nydia M. Torres Bonacía

/s/ Noemí Landrau Rivera

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